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8 Attorneys for Defendant
NATIONAL UNION FIRE INSURANCE
COMPANY OF PITTSBURGH, PA
9

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA

12 24 HOUR FITNESS USA, INC.,)	Case No. 3:11-CV-02695-SC
)	
13 Plaintiff,)	STIPULATION OF PLAINTIFF 24
)	HOUR FITNESS USA, INC. AND
14 vs.)	DEFENDANT NATIONAL UNION FIRE
)	INSURANCE COMPANY OF
15 NATIONAL UNION FIRE INSURANCE)	PITTSBURGH, PA TO RESCHEDULE
16 COMPANY OF PITTSBURGH, PA,)	DATE OF CASE MANAGEMENT
)	CONFERENCE
17 Defendant.)	

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19 Pursuant to Local Rule 16-2, plaintiff 24 Hour Fitness USA, Inc. ("24 Hour Fitness") and
20 defendant National Union Fire Insurance Company of Pittsburgh, PA ("National Union") hereby
21 stipulate:

22 1. The Case Management Conference in this action is set for September 23, 2011.
23 National Union's trial counsel, William C. Morison and Marc J. Derewetzky of Morison Holden
24 Derewetzky & Prough, LLP, are both scheduled to be in North Carolina for business-related
25 matters on that day.

26 2. Pursuant to Local Rule 16-2(d)(2), National Union's counsel conferred with
27 counsel for 24 Hour Fitness, Marion B. Adler of Rachlis Durham Duff Adler & Peel, LLC, by
28 both telephone and email on August 18, 2011 about the request to reschedule the Case

1 Management Conference.

2 3. Ms. Adler advised Mr. Derewetzky that 24 Hour Fitness does not object to
3 rescheduling the Case Management Conference, provided that the new date did not pose a
4 scheduling conflict for her and provided that it does not result in undue delay in the case.

5 4. Mr. Derewetzky and Ms. Adler are both available on either September 16, 2011 or
6 on Friday, October 14, 2011 for the Case Management Conference, and request that it be
7 rescheduled to one of those dates. (Neither is available on Friday, September 30, 2011 nor on
8 Friday, October 7, 2011.)

9 5. Neither party has previously requested a continuance of any proceeding in this
10 action.

11 4. Pursuant to Local Rule 16-2(d)(3), the parties submit the following proposed
12 revised case management schedule:

13 The Case Management Conference is scheduled for [either Friday, September 16, 2011 or
14 Friday, October 14, 2011] at 10:00 a.m. before the Honorable Samuel Conti. Parties are to file
15 one Joint Case Management Statement seven days before the conference.

16 It is so STIPULATED.
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2 Dated: August 18, 2011

MORISON HOLDEN DEREWETZKY &
PROUGH, LLP

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4
5 By: /s/ Marc J. Derewetzky

Marc J. Derewetzky

6 Attorneys for Defendant NATIONAL UNION FIRE
7 INSURANCE COMPANY OF PITTSBURGH, PA

8
9 Dated: August 18, 2011

RACHLIS DURHAM DUFF ADLER & PEEL, LLC

10
11
12 By: /s/ Marion B. Adler

Marion B. Adler (*pro hac vice*)

13 Attorneys for Plaintiff 24 HOUR FITNESS USA,
14 INC.

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16
17 PURSUANT TO STIPULATION, IT IS SO ORDERED.

18
19 Dated:


United States District Judge

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24 148816

Other Documents

3:11-cv-02695-SC 24 Hour Fitness USA, Inc. v. National Union Fire Insurance Co. of Pittsburgh, PA

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Northern District of California
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The following transaction was received from by Derewetzky, Marc entered on 8/18/2011 4:26 PM and filed on 8/18/2011

Case Name: 24 Hour Fitness USA, Inc. v. National Union Fire Insurance Co. of Pittsburgh, PA

Case Number: 3:11-cv-02695-SC

Filer: National Union Fire Insurance Co. of Pittsburgh, PA

Document Number: 14

Docket Text:

STIPULATION of Plaintiff 24 Hour Fitness USA, Inc. and Defendant National Union Fire Insurance Company of Pittsburgh, PA to Reschedule Date of Case Management Conference by National Union Fire Insurance Co. of Pittsburgh, PA. (Derewetzky, Marc) (Filed on 8/18/2011)

3:11-cv-02695-SC Notice has been electronically mailed to:

Marc J. Derewetzky marc.derewetzky@mhdplaw.com, ashley.hendricks@mhdplaw.com, joel.eads@morisonansa.com, philip.witte@mhdplaw.com, records.request@mhdplaw.com, robert.gonsowski@mhdplaw.com, william.morison@mhdplaw.com

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3:11-cv-02695-SC Please see General Order 45 Section IX C.2 and D; Notice has NOT been electronically mailed to:

The following document(s) are associated with this transaction:

Document description:Main Document

Original filename:C:\fakepath\Stip to Continue Case Mgmt Conf.pdf

Electronic document Stamp:

[STAMP CANDStamp_ID=977336130 [Date=8/18/2011] [FileNumber=7758198-0]

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